

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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MARTIN J. WALSH SECRETARY OF LABOR, UNITED STATES DEPARTMENT OF LABOR,	)	<b>Exhibit C</b>
	)	
Petitioner,	)	
	)	
v.	)	Misc. Action No. _____
	)	
QUALITY INN AND SUITES – DANVILLE, JACOB ADIGWE and EZEKIEL ADIGWE	)	
	)	
Respondents.	)	
	)	

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**DECLARATION OF MATTHEW EPSTEIN**

Pursuant to 28 U.S.C. § 1746, I, Matthew Epstein, declare under penalty of perjury as follows:

1. I am a senior trial attorney for the United States Department of Labor in the Philadelphia Regional Solicitor's Office.
2. In my role I am responsible for supporting client agencies such as the Wage and Hour Division of the Department of Labor ("Wage and Hour"). I was assigned to assist Wage and Hour obtain records in connection with the administrative subpoenas that are the subject of this action.

3. On April 12, 2022, I e-mailed and mailed a letter and copies of the subpoenas that are the subject of this action to Jacob and Ezekiel Adigwe at the following addresses:

93 Barker Ave, Sharon Hill, PA 19079-1416  
300 Macdade Blvd, Collingdale, PA 19023-1600  
2031 Ravenwood Rd, Folcroft, PA 19032-1508  
37 Valley West Road, Danville, PA 17821  
[eandjventures@gmail.com](mailto:eandjventures@gmail.com)  
[303qualityinn@gmail.com](mailto:303qualityinn@gmail.com)

4. On April 14, 2022, I received a telephone call from Paul V. Isicrate. Mr. Isicrate stated to me that he is a lawyer who had been contacted by Jacob Adigwe regarding the subpoena I mailed and e-mailed to Mr. Adigwe. Mr. Isicrate stated to me that he does not represent Mr. Adigwe. I asked that he inform Mr. Adigwe that the Department needed to obtain compliance with the subpoenas and he indicated that he would do so. I made a record of this conversation in my electronic file and confirmed that Mr. Isicrate is an attorney licensed to practice law in the Commonwealth of Pennsylvania and that the phone number I was called from is publicly listed as his phone number. *See* Attorney Lookup, Disciplinary Board of the Supreme Court of Pennsylvania,

<https://www.padisciplinaryboard.org/for-the-public/find-attorney/attorney-detail/22215> (last accessed April 26, 2022).

5. On April 22, 2022, I sent a follow-up e-mail to Jacob and Ezekiel Adigwe at the e-mail addresses listed above. Neither has responded to that e-mail.

6. Neither Jacob nor Ezekiel Adigwe nor the Quality Inn have provided records to me or to Wage and Hour.

Executed on May 5, 2022.

By: /s/ Matthew R. Epstein  
Matthew R. Epstein  
Senior Trial Attorney  
United States Department of Labor